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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Joint Application of Southern California
Edison Company (U338E) and San Diego
Gas & Electric Company (U902E) to Find
the 2014 SONGS Units 2 and 3
Decommissioning Cost Estimate
Reasonable and Address Other Related
Decommissioning Issues.

Application 14-12-007
(Filed December 10, 2014)

**MOTION FOR PARTY STATUS OF CALIFORNIANS FOR GREEN
NUCLEAR POWER**

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July 1, 2016

I. Introduction

Californians for Green Nuclear Power (CGNP) respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

II. Interest in this Proceeding

A. Californians for Green Nuclear Power ("CGNP") has several relevant qualifications to participate in proceeding. We are a not-for-profit educational organization recently recognized by the Internal Revenue Service under section 501(c)(3). We are independent of any public utility or other organization with an economic interest with respect to the operation and/or decommissioning of San Onofre Nuclear Generating Station ("SONGS"). Among our membership are a number of Ph.D.s in the natural science or engineering fields.

Since 2013, we have participated in the activities of government entities or oversight bodies regarding the continued safe operation of another California nuclear facility, Diablo Canyon Power Plant ("DCPP"), providing in-person testimony and/or written testimony. Those government entities include:

- California Energy Commission (CEC)
- California State Water Resources Control Board (SWRCB)
- Diablo Canyon Independent Safety Committee (DCISC)
- California Coastal Commission (CCC)
- California State Lands Commission (SLC)
- Nuclear Regulatory Commission (NRC)

Our public outreach efforts have included the publication of Op-Eds or Letters to the Editor in California newspapers, and our Board members have been participants in California talk radio programs. CGNP board members have been interviewed and quoted by local, state, and national publications regarding the benefits of the continued operation of DCPP. We have provided speakers to address local civic groups regarding the benefits of continued operation of

DCPP, currently California's largest point source of electricity. Upon request, CGNP will supply references regarding our public education and outreach efforts.

B. CGNP has general aims which relate to this proceeding. Our group was established in 2013 when its founders recognized a vocal minority of opponents to nuclear power were exerting an outsized influence on policy by virtue of appeals to emotion rather than science. With scientists and engineers among our membership, we support an evidence-based approach to policy decisions. We accept the consensus of environmental scientists and economists that the most cost-effective way to fight global warming in California is to replace fossil fuel combustion, where possible, with cleaner sources. As citizens, we support enforcement of the responsibility of utilities, as natural monopolies, to act *in the public interest* - an interest of which, upon enactment of The Energy Policy Act of 2005, the Federal Energy Regulatory Commission ("FERC") and state public utility commissions became joint guardians.

Though from an environmental perspective California's focus has been renewable energy, this focus is misplaced. Solar produces no power at night and minimal power when the sky is cloudy. Wind produces no power when wind speed falls below a threshold of approximately 3 MPH. Hydropower has been diminished by global warming over four decades; other sources are non-substantial and/or non-scalable. Thus, maintaining a reliable supply of electricity requires supplementation with non-intermittent (dispatchable) generation. In 2013, 58% of California's generation was the result of burning fossil fuels, resulting in 92 million tons of greenhouse gas emissions. The majority was the result of burning methane ("natural gas").

In contrast, nuclear energy generates a steady supply of carbon-free electricity regardless of weather or time of day, and for decades this capability has been a valuable asset for reducing California's harmful greenhouse gas (GHG) emissions. As electric vehicles replace more of the state's 37 million internal combustion ones, clean nuclear electricity has the potential of making transportation truly emission-free, and is already helping to move the state closer to meeting targets for 2020 as established by California State Legislature AB 32 (among other legislation) and Governor Brown's Executive Order B-30-15. Both burning fossil fuels (gasoline, diesel,

coal, and methane) and associated leaks (the Aliso Canyon methane leak of 2015-2016) divert California from the clean energy future our state's voters have overwhelmingly endorsed.

CGNP's specific aim herein is to demonstrate conclusively that, absent evidence to the contrary emerging from the ongoing investigation relevant to this proceeding:

1. Southern California Edison Company and San Diego Gas and Electric Company ("Owners") have failed to justify how a tractable maintenance issue warranted the shutdown of SONGS, a \$4.5 billion nuclear facility, and the assumption of billions of dollars in costs for decommissioning and energy replacement.
2. Justification lacking, the shutdown was neither reasonable in light of the whole record nor in the public interest, thus
3. Any settlement requiring compensation by ratepayers therefor is unjustifiable and fails to meet the Commission's standard for approving such agreements: "The Commission will not approve settlements, whether contested or uncontested, unless the settlement is reasonable in light of the whole record, consistent with law, and in the public interest." (Rule 12.1(d)).

In support we will show:

1. The replacement steam generator ("RSG") maintenance issue never represented a health risk to the public.
2. Responsible, ongoing maintenance renders decommissioning of SONGS (or any nuclear plant) unnecessary.
3. The safety record of SONGS has been exemplary.
4. The shutdown of SONGS resulted in decreased reliability for California's grid, as is evident by the current threat of rolling blackouts for Southern California.
5. The shutdown of SONGS resulted in a substantial increase in California's carbon emissions with corresponding implications for public health and the environment.

6. The shutdown of SONGS resulted in a significant increase in Californians' electricity rates from necessary changes to merit-order selection of generation sources due to binding transmission constraints.
7. Public interest warrants an independent, comparative cost/benefit analysis of the option of restoring SONGS to operational status, including repairs, refueling, testing, and relicensing, vs. the option of continuing the decommissioning process, including the likely environmental, health, and economic impacts of replacing SONGS' generation permanently with other sources.

III. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to Californians for Green Nuclear Power at the address set forth below:

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Californians for Green Nuclear Power
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IV. Conclusion

Californians for Green Nuclear Power's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Californians for Green Nuclear Power respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated: July 1, 2016

Respectfully submitted,

/s/ Carl Wurtz

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